

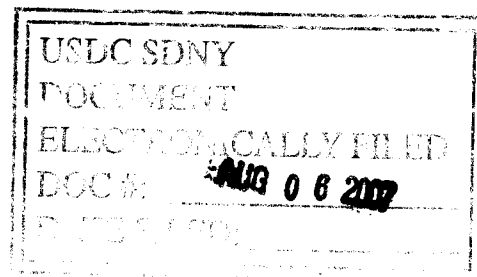
JUDGE JONES

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
- v. - :
 :
KEYSI REYES, :
a/k/a "Ramon Ramirez," :
a/k/a "Alfonso Diaz-Pagan," :
 :
Defendant. :
 :
----- x

07 CRIM
07 Cr. _____

728



COUNT ONE

The Grand Jury charges:

1. From in or about November 2006 through in or about February 2007, in the Southern District of New York and elsewhere, KEYSI REYES, a/k/a "Ramon Ramirez," a/k/a "Alfonso Diaz-Pagan," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that KEYSI REYES, a/k/a "Ramon Ramirez," a/k/a "Alfonso Diaz-Pagan," the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 100 grams and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(B).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about November 21, 2006, KEYSI REYES, a/k/a "Ramon Ramirez," a/k/a "Alfonso Diaz-Pagan," the defendant, collected payment for heroin from an individual at a restaurant in Manhattan, New York.

b. On or about February 1, 2007, REYES handed a bag containing heroin to an individual at a location in Manhattan, New York.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. On or about November 21, 2006, in the Southern District of New York, KEYSI REYES, a/k/a "Ramon Ramirez," a/k/a "Alfonso Diaz-Pagan," the defendant, unlawfully, intentionally, and knowingly, did distribute and possess with intent to distribute a controlled substance, to wit, a quantity of mixtures and substances containing a detectable amount of heroin.

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

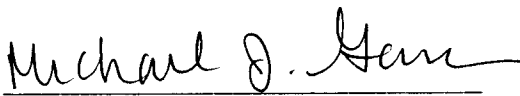
d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

